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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PAUL KENNETH CROMAR,

Defendant.

Case No. 2:23-cr-00159-HCN-DBP

GOVERNMENT'S SECOND
AMENDED PROPOSED JURY
INSTRUCTIONS

District Judge Howard C. Nielson, Jr.

Chief Magistrate Judge Dustin B. Pead

The United States of America respectfully submits its Second Amended Proposed Jury Instructions, which addresses the proposed instruction raised by the Court on May 30, 2024.

[CONTINUED ON NEXT PAGE]

GOVERNMENT’S REQUESTED JURY INSTRUCTION

Indictment is Not Evidence

The indictment is simply the description of the charges made by the government against the defendant; it is not evidence of guilt or anything else. You should not give any weight to the fact that the defendant has been indicted in making your decision in this case.

DATED this 30th day of May, 2024.

Respectfully submitted,

TRINA A. HIGGINS
United States Attorney

By: */s/ Meredith Havekost*
/s/ Patrick Burns

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